

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

JOSE L. RODRIGUEZ RUIZ
IN RE JO ANNE VAZQUEZ RODRIGUEZ

DEBTOR

JOSE L RODRIGUEZ RUIZ
JO ANNE VAZQUEZ RODRIGUEZ

PLAINTIFF

Vs.

RETIREMENT SYSTEM ADMINISTRATION
(RSA)
&
PUERTO RICO POLICE DEPARTMENT (PPD)

DEFENDANTS

CASE No.: 15-07632 (EAG)

Chapter 7

ADV. NO. 16-00205 (EAG)

**MOTION TO WITHDRAW LEGAL REPRESENTATION AND REQUESTING EXTENSION
OF TIME OF SIXTY (60) DAYS TO COMPLY WITH TERMS OF DISCOVERY PLAN**

TO THE HONORABLE EDWARD A. GODOY
UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, the Retirement System Administration (“RSA”), through the undersigned counsel, who respectfully states and prays as follows:

1. On March 27, 2017, Plaintiffs, the RSA and the Puerto Rico Police Department (“PPD”) (collectively, “the Parties”) filed a joint initial scheduling report stating the proposed Discovery Plan and related deadlines in the case at bar. [Dkt. 39]

2. On March 28, 2017, during the Initial Scheduling Conference Hearing, this Honorable Court adopted the proposed Discovery Plan. [Dkt. 41]

3. On May 21, 2017, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico filed a Voluntary Petition under Title III of the Puerto Rico

Oversight, Management, and Economic Stability Act, (“PROMESA”) 42 U.S.C. § 2164 in the United States District Court for the District of Puerto Rico. [**Exhibit A**]

4. As a result of the PROMESA petition, the Employees Retirement System has decided to discontinue having the undersigned counsel as legal representative of the RSA.

5. All motions, orders, notifications and/or judgment of the present case should be directly sent to the legal division of RSA, which will be handling the case hereon. Their contact information is the following:

**EMPLOYEE RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO**

ASR P.O. BOX 42003,
Minillas Station, San Juan, Puerto Rico 00940
Tel: (787) 754-4545 Ext. 1142, 1227, 1325, 1147

6. Based on the foregoing, RSA respectfully requests an extension of sixty (60) days of all deadlines proffered by the Parties and adopted by this Honorable Court during the March 28, 2017 hearing, to afford the RSA’s new legal representative enough time to review all pleadings and resume Discovery.

WHEREFORE, the RSA respectfully requests this Honorable Court to grant the request for withdrawal of legal representation to the undersigned counsel, and that all motions, orders, notifications and/or judgment of the present case be served upon RSA’s legal division, who will be handling the case hereon. In addition, the RSA respectfully requests an extension of sixty (60) days of all deadlines proffered by the Parties and adopted by this Honorable Court during the March 28, 2017 hearing,

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 23rd day of May 2017.

NOTICE

Within fourteen (14) calendar days after service as certified below, or such other time as the court may order hereafter, any party having any objection to the preceding Motion to Withdraw shall serve and file an objection or other appropriate response thereto with the Clerk's Office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the Motion to Withdraw will be deemed unopposed and may be deemed automatically granted, unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interests of justice require otherwise

CERTIFICATE OF SERVICE

I HEREBY CERTIFY: That on this same date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which sends a notification of such filing to the attorney for Plaintiff, Elba I. Vazquez Davila, Esq. I further certify that I have served this document by electronic means to the CM/ECF participants and or a true and correct copy by regular mail to the non-CM/ECF participants.

/s/ Javier Vilariño

JAVIER VILARIÑO

USDC NUM. 223503

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